

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**PLAINTIFFS' JOINT MOTION FOR
STATUS CONFERENCE AND PROPOSED SCHEDULE**

Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “**Curling Plaintiffs**”), together with the Coalition for Good Governance, William Digges III, Laura Digges, Megan Missett, and Ricardo Davis (the “**Coalition Plaintiffs**”), respectfully request a status conference and an expedited schedule for this case, and in connection therewith state:

1. On September 17, 2018, this Court entered an Order denying Plaintiffs’ motions for preliminary injunction and denying in part Defendants’ Motions to Dismiss, including with respect to asserted immunity defenses (“Order”). Doc. 309.
2. This Court’s Order also concluded: “For upcoming elections after

November 2018, Defendants are forewarned that these same arguments would hold much less sway in the future – as any timing issues then would appear to be exclusively of Defendants’ own making at that point.” *Id.* at 44.

3. This Court also found that “a paper ballot initiative with a scanned audit trail [is] critically needed.” *Id.* at 43.
4. This Court further found that “the case would benefit from some discovery and a full evidentiary hearing on the merits over several days.” *Id.* at 32.
5. Finally, the Court emphasized that it “will insist on further proceedings moving on an expedited schedule.” *Id.* at 45-46.

WHEREFORE, the Plaintiffs jointly respectfully request that this Court schedule a status conference at its earliest convenience to discuss an expedited schedule for this case going forward. Plaintiffs have attached a proposed schedule as Exhibit A.

Dated: September 21, 2018

Respectfully submitted,

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2018, a copy of the foregoing
PLAINTIFFS' JOINT MOTION FOR STATUS CONFERENCE AND
PROPOSED SCHEDULE was electronically filed with the Clerk of Court using
the CM/ECF system, which will automatically send notification of such filing to all
attorneys of record.

/s/ David D. Cross
David D. Cross